

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

CERTIFICATION OF COUNSEL

I, Matthew R. Pierce, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “FTX Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On November 11 and November 14, 2022, the FTX Debtors filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the “Bankruptcy Code”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

2. On February 3, 2023, Emergent Fidelity Technologies Ltd (the “Emergent Debtor”) filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code with the Court.

3. On February 16, 2023, BlockFi Inc. (“BlockFi Inc.”), BlockFi Lending LLC (“BlockFi Lending”), and BlockFi International Ltd. (“BlockFi International,” together with BlockFi Inc. and BlockFi Lending, “BlockFi”) filed *BlockFi’s Motion For Entry of an Order*

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

Dismissing the Debtor's Chapter 11 Case [D.I. 32] (the “Motion to Dismiss”) in the Emergent Debtor chapter 11 case.

4. On March 14, 2023, the Court held a hearing (the “March 14 Hearing”) to consider, among other things, the Motion to Dismiss. During the March 14 Hearing, the Court permitted BlockFi to withdraw the Motion to Dismiss without prejudice and scheduled a status conference with respect to a potential agreement (the “Agreement”) to stay or limit certain litigation among the Emergent Debtor, the FTX Debtors, and BlockFi (collectively, the “Parties”).

5. On April 10, 2023, the Court entered the *Interim Order (I) Authorizing Joint Administration of its Chapter 11 Case and (II) Granting Related Relief* [D.I. 1246] authorizing joint administration of the Emergent Debtor’s chapter 11 case with the chapter 11 cases of the FTX Debtors.

6. Also on April 10, 2023, the Court entered an order scheduling a status conference concerning the Agreement for April 12, 2023 at 1:00 p.m. (ET) (the “Status Conference”).

7. On April 11, 2023, the Parties filed the *Notice of Stipulation Regarding Robinhood Assets Litigation* [D.I. 1261] attaching the *Stipulation Staying Litigation and Related Discovery* (the “Stipulation”)² entered into by the Parties regarding a stay of the Robinhood Assets Litigation.

8. Consistent with the Court’s direction at the Status Conference, the FTX Debtors have prepared a proposed form of order (the “Proposed Order”) approving the Stipulation, a copy of which is attached hereto as **Exhibit A**. The Proposed Order has been circulated to the Emergent Debtor, BlockFi, the U.S. Trustee, the Official Committee of Unsecured Creditors appointed in the FTX Debtors’ chapter 11 cases, and the Department of Justice and they have no objection to

² Terms utilized but not otherwise defined herein shall have the meanings ascribed to them in the Stipulation.

the entry of the Proposed Order. In accordance with the Court's electronic order processing procedures, a clean copy of the Proposed Order shall be uploaded to CM/ECF.

9. Accordingly, the FTX Debtors respectfully request that the Court enter the Proposed Order at its earliest convenience.

Dated: April 14, 2023
Wilmington, Delaware

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/s/ Matthew R. Pierce

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